

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON– SEATTLE DIVISION**

LOZANO ET AL,

Plaintiffs/Respondents

v.

DOES I-X, ET AL,

Defendants,

v.

BIRCH,

Petitioner.

Civil Misc. Action No. 2:22-mc-00078

Judge Robert S. Lasnik

ATTACHMENT C

From: [Kirsten Fraser](#)
To: ["Stefania Ramos"](#)
Subject: RE: Lozano et al v. Doe, et al. Subpoena
Date: Tuesday, September 27, 2022 4:40:39 PM

Ms. Ramos Birch,

I certainly understand your medical situation and have no intention of trying to disturb you before the birth of your child, and especially in the weeks after.

I would, however, like to pencil in a date for your deposition and document production. Would the week of December 12th be amenable to your deposition and document production? Is there a date that would work best for you?

Thank you for your attention to this matter,

Kirsten Fraser
ORGAN LAW LLP
1330 Dublin Road
Columbus, Ohio 43215
614.481.0900/614.869.3221 (direct)
614.481.0904 (f)
www.organlegal.com

From: Stefania Ramos [mailto:ramosimmigration@gmail.com]
Sent: Friday, September 23, 2022 12:32 PM
To: Kirsten Fraser <kfraser@organlegal.com>
Subject: Re: Lozano et al v. Doe, et al. Subpoena

Hello Ms. Fraser,

Please see the attached letter from my medical provider. Considering my due date and complications, I am not medically cleared for any court work or deposition after 10/01. So, it is looking like my earliest availability will not be until December.

Sincerely,

Stefania Ramos Birch, Esq.

***Ramos Immigration P.L.L.C.
20801 HWY 99, Ste 201
Lynnwood, WA 98036
P: (425)218-7458
F: 1(206)494-7803***

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On Thu, Sep 22, 2022 at 3:46 PM Kirsten Fraser <kfraser@organlegal.com> wrote:

Absolutely and I apologize if my email came across as pestering. Sometimes my emails go to junk mail, so I follow-up to be sure.

On Sep 22, 2022, at 5:07 PM, Stefania Ramos
<ramosimmigration@gmail.com> wrote:

Ms. Frasier,

Please be advised that my availability to respond to emails is extremely limited at the moment due to my pregnancy, limited time in the office, and my last day in the office being 9/30. I should be able to respond to you by tomorrow afternoon. I'd appreciate your patience.

Sincerely,

Stefania Ramos Birch, Esq.

Ramos Immigration P.L.L.C.

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Lynnwood, WA 98036

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On Thu, Sep 22, 2022 at 1:37 PM Kirsten Fraser <kfraser@organlegal.com> wrote:

Stefania,

I'm following up on my email from yesterday morning.

Thanks,

Kirsten Fraser

ORGAN LAW LLP

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Columbus, Ohio 43215

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From: Kirsten Fraser

Sent: Wednesday, September 21, 2022 9:46 AM

To: 'ramosimmigration@gmail.com' <ramosimmigration@gmail.com>

Subject: Lozano et al v. Doe, et al. Subpoena

Stefania,

Thank you for your call last week regarding the third party subpoena that was served on you. I'm writing to memorialize our conversation. You agreed to look for responsive documents, and that we would postpone the deposition for several weeks given the upcoming birth of your child. I would like to set some timelines regarding the documents. Would it be reasonable for you to look for the documents and get back to me by October 14th? As for the deposition, one thought I had was to do a brief deposition over Zoom this week or next, so that it is not looming over your head. Otherwise, could we look for a date in mid to late November or early December?

Best regards,

Kirsten Fraser

ORGAN LAW LLP

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